

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ANGELA POE *et al*,

Plaintiffs,

v.

ALEJANDRO MAYORKAS, *et al*,

Defendants.

No. 21-cv-10218-WGY

**UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMIT ON  
MEMORANDUM IN SUPPORT OF PRELIMINARY INJUNCTION**

Plaintiffs respectfully move for up to five additional pages beyond the L.R. 7.1(b)(4) limit for their Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Injunction, which Plaintiffs anticipate filing within 24 hours. Defendants do not oppose this request.

This case presents novel issues of legal importance that are a matter of life and death for the plaintiff families. A modest number of additional pages are needed to address the factual circumstances of each of the three plaintiff families; the multiple legal bases on which Plaintiffs are entitled to preliminary injunctive relief; and the detailed statutory and regulatory scheme implicated by federal government's invocation of quarantine and inspection provisions of 42 U.S.C. § 265 to expel migrants while disregarding the comprehensive procedures required by the Immigration and Nationality Act. Plaintiffs will show that this expulsion program under Title 42 is unlawful for at least three independent reasons. Given these important legal questions and risk to human lives, Plaintiffs submit that there is good cause to permit an increase to the page limit. Plaintiffs will, of course, consent to a similar page extension for the Government's responsive brief should it so request.

Dated: March 1, 2021

Respectfully submitted,

/s/ Adam J. Kessel

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### **LOCAL RULE 7.1 CERTIFICATION**

I, Adriana Lafaille, counsel for the Plaintiffs, hereby certify that I have conferred with counsel for Defendants in a good faith attempt to narrow or resolve the issues in dispute.

Defendants have assented to the relief requested.

/s/Adriana Lafaille

Adriana Lafaille